

# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

Plaintiff: Michael Mayo

Case No. 1:21-cv-5014

V.

Hon. Judge M. David Weisman

Defendant Tom Dart

## MOTION FOR ATTORNEY REPRESENTATION

1. I, Michael Mayo, declare that I am the plaintiff in this case and that I am unable to afford or find an attorney that will take my case. I hereby ask the Court for an attorney to represent me in this case.
2. I declare that I have contacted the following attorneys over the last 2 years, but I have been unable to find an attorney because of my incarceration status or the firms do not have time.
  1. Canel, King and Jones 312-372-4142
  2. Jenner and Block
  3. Julie O. Herrera 312-697-0022
  4. Sidley Austin LLP 312-853-7000
  5. Loevy and Loevy 312-243-5900

**FILED**

AUG -1 2023 JC

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

(1)



6. Northwestern 312-503-8576
7. Thomas Morrissey 773-233-7900
8. GKW and W 312-362-0000
9. ACLU 312-201-9740
10. Nick Lane 312-574-0209
11. Sean Brown 708-858-1402
12. Alexa Van Brunt, Director 312-503-1271
13. Equip for Equality 312-341-0022
14. People's Law Office (773)-235-0070
15. Uptown People's Law Center (773) 769-1411
16. Gregory Kulis (312) 580-1830
17. Dvorak Law Offices, LLC (312) 593-7146
18. Meyer/Kiss (312) 765-0100

3. I declare that, I am currently represented by an attorney requested by the Court in a federal civil case.

Case Name: Michael Mayo VS. Larry Gavin et al.

Case Number: 1:21-cv-04653

Attorney's Name: David Zott (Kirkland and Ellis)

This case is pending

4. I declare that my highest level of education is:  
College graduate



5. This case involves deceptive practice by the defendant, which should be revealed.
6. I have defended this case since its inception over 2 years ago. I fear that now having completed one deposition, interrogatories, production and admit/deny this case may not survive summary judgement without competent attorney representation.
7. Plaintiff prays that the Honorable Judge M. David Weisman rules in plaintiff's favor and grants his motion for attorney representation.
8. I declare under penalty of perjury that the foregoing is true and correct.

Michael Mayo  
Movant's Signature

2700 South California  
Street Address

July 12, 2023  
Date

Chicago, IL 60608  
City, State, Zip

LAW OFFICES  
**CANEL, KING & JONES**  
THREE FIRST NATIONAL PLAZA  
70 WEST MADISON STREET, SUITE 3970  
CHICAGO, ILLINOIS 60602  
312-372-4142  
FACSIMILE 312-372-6737

PETER M. KING  
WILLIAM H. JONES

JEFFREY M. MATHIS  
\_\_\_\_\_  
JAY A. CANEL P.C.  
RETIRED

October 30, 2019

Michael Mayo  
20181127027  
P.O. Box 089002  
Div 08-3G-D5-34  
Chicago, Illinois 60608

Re: October 21, 2019, Letter

Dear Mr. Mayo:

Thank you for your letter and for your interest in our firm. I am interested in talking to you about your potential case. Please let me know how your criminal case turns out.

My firm has represented individuals in several high-profile civil rights cases over the years. I enclose some information pages from our website.

Respectfully yours,



Peter M. King

PMK/jfw

Enclosures

cc: William H. Jones via email only  
Jeffrey M. Mathis via email only



353 N. CLARK STREET CHICAGO, IL 60654-3456

JENNER & BLOCK LLP

October 30, 2019

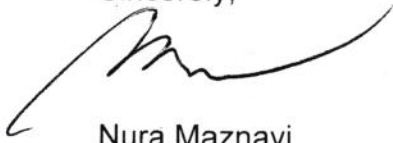
Michael Mayo #20181127027  
Cook County Department of Corrections  
P.O. Box 089002  
Chicago, IL 60608

Dear Mr. Mayo:

I am the Pro Bono Coordinator at Jenner & Block. I received a copy of your letter requesting pro bono representation. After careful review of your request, we have determined that Jenner & Block will not be able to represent you.

Each year Jenner & Block receives hundreds of requests for pro bono representation. Unfortunately, because of the tremendous volume of requests we receive, we are unable to undertake each one.

Sincerely,



Nura Maznavi

THE LAW OFFICE OF  
**Julie O. Herrera**

The Law Office of Julie O. Herrera  
53 W. Jackson, Suite 1615  
Chicago, IL 60604

[www.julieherrerallaw.com](http://www.julieherrerallaw.com)  
[jherrera@julieherrerallaw.com](mailto:jherrera@julieherrerallaw.com)

Tel: 312 697 0022 Fax: 312 697 0812

October 31, 2019

**LEGAL MAIL**

Michael Mayo  
Inmate No. 20181127027 | Booking No. 794313  
P.O. Box 089002  
Chicago, Illinois 60608

Mr. Mayo:

Thank you for your letter. We have decided that we are not interested in representing you. Thus, we will not be taking any further action on your behalf. **Please keep in mind that there are strict deadlines for any potential claims you may have or might have in the future.**

Thank you for contacting us, and we wish you the best of luck.

Sincerely,  
Steve Molitor



SIDLEY AUSTIN LLP  
ONE SOUTH DEARBORN STREET  
CHICAGO, IL 60603  
+1 312 853 7000  
+1 312 853 7036 FAX

BEIJING	HONG KONG	SHANGHAI
BOSTON	HOUSTON	SINGAPORE
BRUSSELS	LONDON	SYDNEY
CENTURY CITY	LOS ANGELES	TOKYO
CHICAGO	NEW YORK	WASHINGTON, D.C.
DALLAS	PALO ALTO	
GENEVA	SAN FRANCISCO	

FOUNDED 1866

November 6, 2019

**Via Regular Mail**

Michael Mayo 20181127027  
Cook County Jail  
P.O. Box 089002; Div 08-3G-05-34  
Chicago, IL 60608

Dear Michael Mayo:

We received your letter dated 10/24/2019. Unfortunately, we are not able to represent you in this matter. As you can imagine, we receive many more requests to provide *pro bono* legal services than we are able to accommodate. Enclosed with this letter is a list of free and low-cost legal providers in the Chicago area that you may wish to contact. We wish you the very best luck.

Very truly yours,

A handwritten signature in cursive script that reads "Kelly Huggins".  
Kelly Huggins

# LOEVY & LOEVY

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311 N. Aberdeen St., 3rd Floor, Chicago, Illinois 60607

December 4, 2019

## ***CONFIDENTIAL LEGAL CORRESPONDENCE***

*Via USPS Mail*

Michael Mayo 20181127027

Cook County Jail

P.O. Box 089002

Chicago, IL 60608

*Re: Your request for legal representation*

Michael Mayo:

This letter is to inform you that after reviewing your file, we are unfortunately unable to take your case.

Please be advised that there are time limitations that govern the period in which a claim or lawsuit may be filed. Such time periods depend on the cause of action you may wish to pursue. However, we encourage you to follow up with other attorneys immediately to ensure that all legal rights are fully explored and protected.

We appreciate your decision to contact us, and wish you the best of luck in pursuing your claims.

Sincerely,

Loevy & Loevy



# Northwestern

PRITZKER SCHOOL OF LAW

Bluhm Legal Clinic

Center on Wrongful Convictions

December 18, 2019

Michael Mayo  
2018-1127027  
Cook County Jail  
P.O. Box 089002  
Chicago, IL 60608

Dear Mr. Mayo:

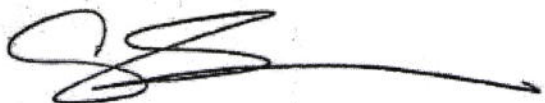
Thank you for writing to The Center on Wrongful Convictions.

The Center on Wrongful Convictions is a not-for-profit legal clinic dedicated to representing individuals who assert claims of actual innocence. The CWC represents individuals after the criminal trial is complete and resulted in a conviction and sentence. We do not handle cases of sentence reduction or civil lawsuits.

In order for the CWC to consider a case, we must receive a letter *from the defendant* that asserts actual innocence and details the events that led to the wrongful conviction.

Thank you again for writing.

Sincerely,



Sara Sommervold  
Intake Attorney

SS/mt  
Signed in absence

THOMAS G. MORRISSEY, LTD.  
ATTORNEY AT LAW  
10150 SOUTH WESTERN AVENUE, REAR SUITE  
CHICAGO, ILLINOIS 60643  
773-233-7900  
FAX: 773-239-0387

Cell 312-497-2451

THOMAS G. MORRISSEY  
TGMORRISSEYLAW@GMAIL.COM

PATRICK W. MORRISSEY  
PATRICKMORRISSEY1920@GMAIL.COM

Mr. Michael Mayo LEGAL MAIL  
2018-1127027  
P.O. Box 089002  
Chicago, IL 60608

Re: COVID-19

April 17, 2020

Dear Mr. Mayo:

I write to you following receipt of a letter you wrote to our office on April 4, 2020, regarding the outbreak of COVID-19 at the jail.

My office is currently investigating the conditions at the Cook County Jail as well as Stroger Hospital for inmates with coronavirus. We represent the family of a former inmate. This inmate was assigned to RTU Tier 3D and was transferred to Stroger for medical attention. At Stroger, this inmate was shackled by hand and foot to the hospital bed for several days.

Do you or any cellmates have information about the present conditions at the Jail pertaining to the coronavirus? I hear inmates at the Jail are having a difficult time obtaining cleaning supplies, health service request forms, access to grievances, etc. If you or anybody would like to speak with my office, please me at ether (773)233-7900 or (773)238-4235.

My office has been recommending inmates write emergency grievances if they are unable to attain standard grievance forms, and they wish to file a grievance. To do so, the inmate must write "Emergency Grievance" on any piece of paper, followed by describing the grievance, including (1. whether the inmate believes they were exposed to COVID-19 due to conditions at the jail, and (2. That the Sheriff has not taken appropriate measures to protect inmates from the virus. Then, give the grievance to a correctional officer, and mark down the name and ID number of the officer, as well as keeping a copy of the grievance for yourself, if possible.

My office presently has limited office hours due to coronavirus, but there is usually staff available to answer phones (Tuesday, Wednesday, Friday) from 11:00 a.m. to 2:00 p.m.



Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Morrissey", with a stylized flourish at the end.

Patrick Morrissey

**GARDINER KOCH WEISBERG & WRONA**

Attorneys at Law

**GKW<sup>&</sup>W**

53 West Jackson Blvd. Suite 950  
Chicago, Illinois 60604  
Telephone 312.362.0000  
Direct Dial: 312.784.1200  
Facsimile 312.362.0440  
[www.gkwlaw.com](http://www.gkwlaw.com)

June 17, 2020

**Sent via U.S. Mail**

Michael Mayo  
20181127027  
Div 08-3G-D5-34  
P.O. Box 089002  
Chicago, IL 60608

Dear Mr. Mayo:


You contacted our office regarding your possible case. Unfortunately, we are unable to assist you in your case. Please note that all cases have statutes of limitations and that you will be generally precluded from filing a complaint in your case unless you act in timely fashion. If you seek to proceed with your claim, you should obtain counsel immediately.

Our firm has achieved millions of dollars of result for our clients on the plaintiff side of litigation and have saved our clients millions of dollars on the defense side in other cases. We would welcome the opportunity to assist you if you have legal matters in the future. We would also appreciate a call from you or a friend or relative involved in a civil litigation matter including cases involving contract disputes, shareholders disputes, injury, death, or discrimination cases.

Thank you again for contacting our firm.

Very truly yours,

GARDINER KOCH WEISBERG & WRONA

A handwritten signature in black ink, appearing to read 'Thomas G. Gardiner', is written over the printed name and firm name.

Thomas G. Gardiner

Cc: Dean Morask  
TGG/ks





**ROGER BALDWIN FOUNDATION  
OF ACLU, INC.**

**Illinois**

**ROGER BALDWIN FOUNDATION  
OF ACLU, INC.**  
150 N. MICHIGAN AVENUE  
SUITE 600  
CHICAGO, ILLINOIS 60601-7570  
(312) 201-9740  
FAX (312) 201-9760  
WWW.ACLU-IL.ORG

June 18, 2020

Mr. Michael Mayo #20181127027  
P. O. Box 089002  
Div 08-3G-D5-34  
Chicago, IL 60608

Dear Mr. Mayo:

Thank you for contacting the American Civil Liberties Union of Illinois. We apologize for the delay in responding to your message. We have reviewed your situation carefully and we regret to inform you that we still will not be able to accept your case because we do not handle individual cases about jail conditions.

As you probably know by now, a lawsuit about the conditions at the county jail was filed by attorneys at Northwestern Law School and others. If the difficulties you report are continuing, you should reach out to Attorney Alexa van Brunt at Northwestern. Her contact information is:

Alexa Van Brunt, Director  
MacArthur Justice Center Clinic at Northwestern Pritzker School of Law  
357 East Chicago Avenue  
Chicago, IL 60611  
312-503-1271  
<http://www.macarthurjusticecenter.org/index.html>

We receive more than 20,000 requests annually for legal assistance. Our resources are limited and we can only act upon a small percentage of the requests.

Please accept our regrets that we cannot help you with your situation. We are not able to return the documents you sent us because we are working remotely.

Sincerely,

Intake Department

# LOEVY & LOEVY

311 N. Aberdeen St., 3rd Floor, Chicago, Illinois 60607

October 19, 2020

## ***CONFIDENTIAL LEGAL CORRESPONDENCE***

*Via USPS Mail*

Michael Mayo 20181127027

Cook County Jail

P.O. Box 089002

Chicago, IL 60608

*Re: Your request for legal representation*

Michael Mayo:

This letter is to inform you that after reviewing your file, we are unfortunately unable to take your case.

Please be advised that there are time limitations that govern the period in which a claim or lawsuit may be filed. Such time periods depend on the cause of action you may wish to pursue. However, we encourage you to follow up with other attorneys immediately to ensure that all legal rights are fully explored and protected.

We appreciate your decision to contact us, and wish you the best of luck in pursuing your claims.

Sincerely,

Loevy & Loevy



LAW OFFICES OF  
**GREGORY E. KULIS AND ASSOCIATES, LTD.**  
134 NORTH LASALLE STREET, SUITE 444  
CHICAGO, ILLINOIS 60602 - 3368

GREGORY E. KULIS  
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BRIAN M. OROZCO  
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VINCENZO B. CAPORALE  
vcaporale@kulislawltd.com

TEL: (312) 580-1830  
FAX: (312) 580-1839  
www.kulislawltd.com

SAMI ZIAD AZHARI  
OF COUNSEL

June 26, 2023

OF COUNSEL  
GEORGE G. LEYNAUD  
REBECCA M. LEYNAUD

LASALLE COUNTY OF COUNSEL  
OFFICE  
1200 38<sup>TH</sup> STREET  
PERU, ILLINOIS 61354  
(815) 224-4700

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**SENT VIA LEGAL MAIL**

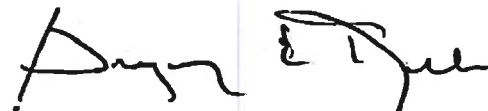
Micheal Mayo  
20181127027  
2700 South California  
Chicago IL 60608

**RE: Potential Matter**

Dear Mr. Mayo.

Unfortunately, you are asking us to go do research on all your lawsuits without telling too much. Due to that and our current overloaded docket we must decline. Wish you well.

Respectfully yours,



GEK/zjs